IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

*	§	C) 44
In re:	8	Chapter 11
CTEMADD HEALTH CADE CUCTEM	8	C N- 24 00212 (CMI)
STEWARD HEALTH CARE SYSTEM	§	Case No. 24-90213 (CML)
LLC, et al.,	8 8	(Jointly Administered)
Debtors. ¹	8	(Jointly Administered)
	8 §	Re: Docket No. 2786

NOTICE OF FILING OF REVISED PROPOSED ORDER APPROVING THE SALE OF ST. JOSEPH MEDICAL CENTER, MEDICAL CENTER OF SOUTHEAST TEXAS, AND SOUTH FLORIDA HOSPITALS TO HEALTHCARE SYSTEMS OF AMERICA

PLEASE TAKE NOTICE THAT:

- 1. On May 6, 2024, Steward Health Care System LLC and its debtor affiliates, as debtors and debtors in possession in the above-captioned chapter 11 cases (the "**Debtors**"), each commenced with this Court a voluntary case under chapter 11 of title 11 of the United States Code.
- 2. On October 3, 2024, the Debtors filed the Notice of Designation of Healthcare Systems of America as Designated Operator for St. Joseph Medical Center, Medical Center of Southeast Texas, and South Florida Hospitals (Docket No. 2786) (the "Notice of Designated Operator") designating affiliates of Healthcare Systems of America ("HSA") as the Designated Operator with respect to St. Joseph Medical Center ("St. Joseph"), Medical Center of Southeast Texas ("Port Arthur"), and the South Florida Hospitals².
- 3. A proposed order approving the conveyance of St. Joseph, Port Arthur, and the South Florida Hospitals to HSA (the "**Transaction**") was attached to the Notice of Designated Operator as Exhibit A (the "**Initial Proposed Order**").
- 4. The Debtors hereby file a revised proposed order approving the Transaction, a copy of which is attached hereto as **Exhibit A** (the "**Revised Proposed Order**").
- 5. A redline of the Revised Proposed Order marked against the Initial Proposed Order is attached hereto as **Exhibit B**.

A complete list of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at https://restructuring.ra.kroll.com/Steward. The Debtors' service address for these chapter 11 cases is 1900 N. Pearl Street, Suite 2400, Dallas, Texas 75201.

The South Florida Hospitals include: (i) Coral Gables Hospital, (ii) Hialeah Hospital, (iii) North Shore Medical Center, (iv) Florida Medical Center, and (v) Palmetto General Hospital.

6. The Debtors will seek entry of the Revised Proposed Order at the hearing scheduled for October 25, 2024 at 2:00 p.m. (Central Time).

Dated: October 25, 2024 Houston, Texas

/s/ Clifford W. Carlson

WEIL, GOTSHAL & MANGES LLP Gabriel A. Morgan (24125891) Clifford W. Carlson (24090024) Stephanie N. Morrison (24126930) 700 Louisiana Street, Suite 3700

Houston, Texas 77002 Telephone: (713) 546-5000 Facsimile: (713) 224-9511

Email: Gabriel.Morgan@weil.com

Clifford.Carlson@weil.com Stephanie.Morrison@weil.com

-and-

WEIL, GOTSHAL & MANGES LLP Ray C. Schrock (admitted *pro hac vice*) Candace M. Arthur (admitted *pro hac vice*) 767 Fifth Avenue New York, New York 10153 Telephone: (212) 310-8000

Facsimile: (212) 310-8007 Email: Ray.Schrock@weil.com Candace.Arthur@weil.com

-and-

WEIL, GOTSHAL & MANGES LLP David J. Cohen (admitted *pro hac vice*) 1395 Brickell Avenue, Suite 1200 Miami, Florida 33131 Telephone: (305) 577-3100 Facsimile: (305) 374-7159

Email: DavidJ.Cohen@weil.com

Attorneys for Debtors and Debtors in Possession

Certificate of Service

I hereby certify that on October 25, 2024, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

<u>/s/ Clifford W. Carlson</u>
Clifford W. Carlson

Exhibit A

Revised Proposed Order